To: Arora, Asha@DTSC[Asha.Arora@dtsc.ca.gov]
Cc: Schofield, John[Schofield.John@epa.gov]

From: Lin, Sharon

Sent: Fri 7/31/2015 3:33:36 PM

Subject: RE: Shell Refinery

I am waiting for confirmation from Shell regarding the exact meeting time for Monday. I hope to hear something from them by noon. I will give you a call as soon as I hear back from the facility. I will come by to pick you up on Monday. Hope we can start our day early.

Do you need to notify the CUPA for the TP inspection?

Sharon Lin, P.E. U.S. Environmental Protection Agency Region 9 Enforcement Division Air, Waste and Toxics Branch, ENF-2-2 75 Hawthorne Street San Francisco, CA 94105 Tel: (415) 972-3446

Email: Lin.Sharon@epa.gov

----Original Message----

From: Arora, Asha@DTSC [mailto:Asha.Arora@dtsc.ca.gov]

Sent: Friday, July 31, 2015 7:53 AM

To: Lin, Sharon Cc: Schofield, John Subject: RE: Shell Refinery

Importance: High

Hi Sharon,

I am working (telecommuting) today and I just wanted to confirm two things:

-Have you received a response from Shell? If yes, please share a copy wit me as a portions will help for the TP inspection also.

-What time are you picking me up on Monday?

Thank you Asha cell

From: Lin, Sharon [Lin.Sharon@epa.gov] Sent: Monday, July 20, 2015 2:36 PM To: Arora, Asha@DTSC; Schofield, John

Subject: RE: Shell Refinery

Hi, Asha,

Attached is the Shell Martinez refinery sampling plan (approved by our QA office). I am also attaching the ppt file for the figures since the pictures in the scanned SAP are of poor quality.

The current plan is for me to tag along with you to learn TP. John will be with the EPA field team for the field sampling. We could coordinate so you will be inspecting the TP unit next to the Pond 5D when the pond is being sampled.

Sharon Lin, P.E.

U.S. Environmental Protection Agency Region 9 Enforcement Division Air, Waste and Toxics Branch,

ENF-2-2

75 Hawthorne Street San Francisco, CA 94105 Tel: (415) 972-3446

Email: Lin.Sharon@epa.gov

----Original Message----

From: Arora, Asha@DTSC [mailto:Asha.Arora@dtsc.ca.gov]

Sent: Monday, July 20, 2015 2:18 PM To: Lin, Sharon; Schofield, John Subject: FW: Shell Refinery

Importance: High

Hi Sharon/John,

I am forwarding inspection information received from the Contra Costa County CUPA. DTSC has a number of concerns but not limited to the following:

- Shell's memo and legal interpretation for ERM and their samplings.
- -Sampling and analytical results, including chain of custody.
- -Kleen Blast (Kleen Industrial Services as the owner is the same and he has multiple companies all over the state for the same stuff).
- -DTSC assisted the City of Hayward in taking samples at a Kleen Blast facility in Hayward. We are hoping that the City of Hayward will take enforcement; If not, then DTSC will take enforcement on Kleen Blast as they have a number of companies in the Southern California and they are using the same process.
- -The CUPA conducted HWG inspection in 2 hourss -The CUPA conducted tiered permitting (TP), APSA, and BP inventories inspections in 2 hours

Sharon - I will be working on July 31st and we can chat more. I will be periodically checking my emails...

John - I understand that you will be leading the sampling team. DTSC recommends EPA to take samples from the ETP treatment pond 5D.

Thank you Asha cell (510) 225-8235

From: Melissa.Hagen@hsd.cccounty.us [Melissa.Hagen@hsd.cccounty.us]

Sent: Thursday, July 09, 2015 12:26 PM

To: Arora, Asha@DTSC

Cc: Alexandra.Mcmullen@hsd.cccounty.us

Subject: Fw: Shell Refinery

(See attached file: shell_Jan2015.pdf)

sorry for the delay

Melissa J. Hagen Hazardous Materials Specialist Contra Costa Health Services-HazMat 4585 Pacheco Blvd., Suite 100 Martinez, CA 94553 (925) 335-3200 Office

----- Forwarded by Melissa Hagen/HazMat/HSD/US on 07/09/2015 12:20 PM -----

From: Melissa Hagen/HazMat/HSD/US

To: "Arora, Asha@DTSC" <Asha.Arora@dtsc.ca.gov>,

Date: 07/09/2015 10:42 AM Subject: Re: Shell Refinery

did you get all you needed?

Melissa J. Hagen Hazardous Materials Specialist Contra Costa Health Services-HazMat 4585 Pacheco Blvd., Suite 100 Martinez, CA 94553 (925) 335-3200 Office

From: "Arora, Asha@DTSC" <Asha.Arora@dtsc.ca.gov>

To: "Melissa.Hagen@hsd.cccounty.us" < Melissa.Hagen@hsd.cccounty.us >,

Date: 07/06/2015 08:32 AM Subject: Shell Refinery

Hi Melissa,

I hope everything is going well with you. I have a favor to ask of you. Please email me you last tiered permitting inspection for the Shell refinery.

For the FA, it shows that they have surety bond. Please let me know the Contra Costa County listed as the beneficiary or not.

Thank you Asha

Asha Arora
Senior Environmental Scientist (Specialist) Department of Toxic Substances Control Berkeley Office (510) 540-3874
Asha.Arora@dtsc.ca.gov

To: Lin, Sharon[Lin.Sharon@epa.gov]; Nagle, Greg[Nagle.Greg@epa.gov]; Husby,

Peter[Husby.Peter@epa.gov]; Schofield, John[Schofield.John@epa.gov]

Cc: McDaniel, Doug[McDaniel.Doug@epa.gov]

From: Arora, Asha@DTSC
Sent: Fri 7/31/2015 10:06:56 PM

Subject: RE: Monday (August 3) Shell Martinez Refinery Field work /focused TP inspection

Thank you, Sharon!

Asha

From: Lin, Sharon [Lin.Sharon@epa.gov] **Sent:** Friday, July 31, 2015 12:15 PM

To: Arora, Asha@DTSC; Nagle, Greg; Husby, Peter; Schofield, John

Cc: McDaniel, Doug

Subject: Monday (August 3) Shell Martinez Refinery Field work /focused TP inspection

Meet at Shell's main office building at 3495 Pacheco Blvd in Martinez (very nice new building) at 7:30am on Monday. The environmental affairs manager will be on vacation, but her staff will receive us. There will be a safety briefing first. They will give us a vehicle permit for the sampling vehicle and arrange detailed logistics after the safety briefing.

I told the facility the purpose of the field sampling is to address the data gaps that we identified based on the information we had collected during our March inspection. They fully understand this and also told me that they didn't expect that I would relay sampling locations and etc. beforehand as they are a sophisticated regulated entity. I did mention that we were looking at 4-5 areas to sample and look forward to their full cooperation.

I didn't mention the tiered permitting (TP) inspection as I assume the DTSC TP inspection is usually unannounced.

Perhaps we should start with the WWTP where the two phase separation TP unit is located (adjacent to Pond 5D).

My cell phone is . I will pick up Asha at 7am.

PPE: Nomex, hard hat, goggles, safety glasses, gloves, ear plugs.

Thanks everyone. Have a great weekend. See you at Shell on Monday! Sharon Lin, P.E. U.S. Environmental Protection Agency Region 9 **Enforcement Division** Air, Waste and Toxics Branch, ENF-2-2 75 Hawthorne Street San Francisco, CA 94105 Tel: (415) 972-3446 Email: Lin.Sharon@epa.gov From: Lin, Sharon Sent: Thursday, July 30, 2015 2:03 PM To: Schofield, John; Husby, Peter; Nagle, Greg Subject: Monday Sampling at Shell is on The facility will call me tomorrow morning (by noon) to confirm the time and any specific arrangements that we would need for the sampling vehicle. Peter and Greg, I presume you are accessible by email tomorrow. I will send you the detailed meeting location/time for Monday.

sharon

To: Arora, Asha@DTSC[Asha.Arora@dtsc.ca.gov]
Cc: Schofield, John[Schofield.John@epa.gov]

From: Lin, Sharon

Sent: Fri 7/31/2015 2:55:26 PM

Subject: RE: Shell Refinery

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U.S. Environmental Protection Agency Region 9
Enforcement Division
Air, Waste and Toxics Branch, ENF-2-2
75 Hawthorne Street
San Francisco, CA 94105
Tel: (415) 972-3446

Email: Lin.Sharon@epa.gov

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Subject: RE: Shell Refinery

Importance: High

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Sharon Lin, P.E.

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ENF-2-2

75 Hawthorne Street San Francisco, CA 94105

Tel: (415) 972-3446

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From: Melissa.Hagen@hsd.cccounty.us [Melissa.Hagen@hsd.cccounty.us]

Sent: Thursday, July 09, 2015 12:26 PM

To: Arora, Asha@DTSC

Cc: Alexandra.Mcmullen@hsd.cccounty.us

Subject: Fw: Shell Refinery

(See attached file: shell_Jan2015.pdf)

sorry for the delay

Melissa J. Hagen Hazardous Materials Specialist Contra Costa Health Services-HazMat 4585 Pacheco Blvd., Suite 100 Martinez, CA 94553 (925) 335-3200 Office

----- Forwarded by Melissa Hagen/HazMat/HSD/US on 07/09/2015 12:20 PM -----

From: Melissa Hagen/HazMat/HSD/US

To: "Arora, Asha@DTSC" <Asha.Arora@dtsc.ca.gov>,

Date: 07/09/2015 10:42 AM Subject: Re: Shell Refinery

did you get all you needed?

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For the FA, it shows that they have surety bond. Please let me know the Contra Costa County listed as the beneficiary or not.

Thank you Asha

Asha Arora
Senior Environmental Scientist (Specialist) Department of Toxic Substances Control Berkeley Office (510) 540-3874
Asha.Arora@dtsc.ca.gov

To: Arora, Asha@DTSC[Asha.Arora@dtsc.ca.gov]; Nagle, Greg[Nagle.Greg@epa.gov]; Husby,

Peter[Husby.Peter@epa.gov]; Schofield, John[Schofield.John@epa.gov]

Cc: McDaniel, Doug[McDaniel.Doug@epa.gov]
From: Lin, Sharon

Sent: Fri 7/31/2015 7:15:14 PM

Subject: Monday (August 3) Shell Martinez Refinery Field work /focused TP inspection

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PPE: Nomex, hard hat, goggles, safety glasses, gloves, ear plugs.

Thanks everyone. Have a great weekend. See you at Shell on Monday!

Sharon Lin, P.E.

U.S. Environmental Protection Agency Region 9

Enforcement Division

Air, Waste and Toxics Branch, ENF-2-2 75 Hawthorne Street

San Francisco, CA 94105

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Email: Lin.Sharon@epa.gov

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Sent: Thursday, July 30, 2015 2:03 PM

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Subject: Monday Sampling at Shell is on

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Peter and Greg, I presume you are accessible by email tomorrow. I will send you the detailed meeting location/time for Monday.

sharon

To: Arora, Asha@DTSC[Asha.Arora@dtsc.ca.gov]; Schofield, John[Schofield.John@epa.gov]

From: Lin, Sharon

Sent: Mon 7/20/2015 9:36:59 PM

Subject: RE: Shell Refinery

ShllMrtnzRfnryENFT0009SV2MM-1.pdf

SAPFigures.pptx

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Enforcement Division
Air, Waste and Toxics Branch, ENF-2-2
75 Hawthorne Street
San Francisco, CA 94105
Tel: (415) 972-3446
Email: Lin.Sharon@epa.gov

Email: Em. Gharon @opa.gc

----Original Message----

From: Arora, Asha@DTSC [mailto:Asha.Arora@dtsc.ca.gov]

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Subject: Fw: Shell Refinery

(See attached file: shell_Jan2015.pdf)

sorry for the delay

Melissa J. Hagen Hazardous Materials Specialist Contra Costa Health Services-HazMat 4585 Pacheco Blvd., Suite 100 Martinez, CA 94553 (925) 335-3200 Office

---- Forwarded by Melissa Hagen/HazMat/HSD/US on 07/09/2015 12:20 PM -----

From: Melissa Hagen/HazMat/HSD/US

To: "Arora, Asha@DTSC" <Asha.Arora@dtsc.ca.gov>,

Date: 07/09/2015 10:42 AM Subject: Re: Shell Refinery

did you get all you needed?

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To: "Melissa.Hagen@hsd.cccounty.us" <Melissa.Hagen@hsd.cccounty.us>,

Date: 07/06/2015 08:32 AM Subject: Shell Refinery

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Thank you Asha

Asha Arora Senior Environmental Scientist (Specialist) Department of Toxic Substances Control Berkeley Office (510) 540-3874 Asha.Arora@dtsc.ca.gov To: Arora, Asha@DTSC[Asha.Arora@dtsc.ca.gov]

From: Lin, Sharon

Sent: Fri 11/18/2016 7:06:33 PM

Subject: RE: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining

Company, LLC, CAD08354052

Thanks!

From: Arora, Asha@DTSC [mailto:Asha.Arora@dtsc.ca.gov]

Sent: Friday, November 18, 2016 8:17 AM **To:** Lin, Sharon < Lin. Sharon@epa.gov>

Cc: Soria, Maria@DTSC <Maria.Soria@dtsc.ca.gov>

Subject: RE: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance

Refining Company, LLC, CAD08354052

Hi Sharon,

Attached is Torrance Refinery tiered permitting notification long with facility information. The correct EPA ID# is CAD008354052. I noticed a couple of interesting items in their 2 unit notifications. Please call me on my cellphone and I will update you.

Thank you Asha

Cell

From: Lin, Sharon [mailto:Lin.Sharon@epa.gov]
Sent: Thursday, November 17, 2016 8:05 AM

To: Arora, Asha@DTSC Cc: Soria, Maria@DTSC

Subject: RE: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining

Company, LLC, CAD08354052

| Asha, thanks. |
|---|
| sharon |
| From: Arora, Asha@DTSC [mailto:Asha.Arora@dtsc.ca.gov] Sent: Wednesday, November 16, 2016 7:10 PM To: Lin, Sharon < Lin.Sharon@epa.gov> Cc: Soria, Maria@DTSC < Maria.Soria@dtsc.ca.gov> Subject: Fwd: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining Company, LLC, CAD08354052 |
| Hi Lin, |
| I will provide tiered permitting information from CERS on Friday morning as I am in Long Beach and I do not have my lab top with me. I will be coming home tomorrow evening. |
| If you want to talk with me after getting TP information, please call me on my cellphone. I recall that you also telecommute on Fridays. |
| I am off next week. |
| Thank you! |
| Asha |
| Sent from my iPhone |
| Begin forwarded message: |
| From: "Soria, Maria@DTSC" < Maria.Soria@dtsc.ca.gov > Date: November 16, 2016 at 4:36:19 PM PST |

To: "Arora, Asha@DTSC" < Asha.Arora@dtsc.ca.gov >

Subject: FW: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining Company, LLC, CAD08354052

In your spare time, can you see if CERS has the tiered permitting information that Sharon needs? Thanks.

From: Lin, Sharon [mailto:Lin.Sharon@epa.gov]
Sent: Wednesday, November 16, 2016 3:43 PM
To: Soria, Maria@DTSC; Schofield, John

Cc: Bellamy, Kandice; Lynch, Philip@DTSC; Wu, Brian@DTSC; Kou, Roberto@DTSC; Agarwal,

Mukul@DTSC

Subject: RE: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining

Company, LLC, CAD08354052

Hi, Brian,

We look forward to working with you. The facility history description on the EnviroStor website suggests that various units at the facility are covered under the tiered permitting. I couldn't locate the tiered permitting documents in CERS. Hopefully you folks have it.

Also, if you have a point contact for the corrective action for this facility, that would be great too. Thanks!

Sharon

From: Soria, Maria@DTSC [mailto:Maria.Soria@dtsc.ca.gov]

Sent: Wednesday, November 16, 2016 2:49 PM To: Schofield, John Schofield.John@epa.gov>

Cc: Lin, Sharon <Lin.Sharon@epa.gov>; Bellamy, Kandice <Bellamy, Kandice@epa.gov>;

Lynch, Philip@DTSC < Philip.Lynch@dtsc.ca.gov >; Wu, Brian@DTSC

<a href="mailto:sp

Mukul@DTSC < Mukul. Agarwal@dtsc.ca.gov>

Subject: RE: Notification RCRA Compliance Evaluation Inspection - PBF Energy,

Torrance Refining Company, LLC, CAD08354052

Hi John, Sharon and Kandice. The DTSC staff person assigned to accompany USEPA is Brian Wu from the DTSC Chatsworth office.

Brian, please follow up with Sharon as requested below. You can coordinate with Dan Lynch on files that may reside in the Clovis office if needed. Thank you.

From: Schofield, John [mailto:Schofield.John@epa.gov] Sent: Wednesday, November 16, 2016 2:31 PM

To: Soria, Maria@DTSC

Cc: Lin, Sharon; Bellamy, Kandice

Subject: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining

Company, LLC, CAD08354052

Maria,

This is a follow-up to this afternoon's call. EPA will be conducting a CEI of the reference facility December 5-8, 2016. As stated in our telephone conversation EPA is requesting DTSC to also participate in the inspection. The EPA Inspection Team will be Kandice Bellamy (415-972-3304) and Sharon Lin (415-972-3346). Sharon is the inspection lead.

The general plan is to arrive at the facility the afternoon of December 5th to start the document/information gathering process. The next two full days will be the site inspection which will include evaluation of the facility processes to determine if these processes generated listed and/or characteristic HW (and how the HWs are managed).

In preparing for the inspection, the EPA Inspection Team is developing a list of documents EPA would like to see if DTSC had on hand that could be shared with Region 9 prior to the inspection.

Once a DTSC staff person(s) has been assigned, please have the person(s) contact Sharon to

| begin sharing information and coordinating the inspection schedule. |
|---|
| EPA looks forward to working with DTSC on this inspection. |
| regards, |
| John |

John Schofield U. S. Environmental Protection Agency Region 9 Enforcement Division

Air, Waste and Toxics Branch, ENF-2-2 75 Hawthorne Street San Francisco, CA 94105 (415) 972-3386 (415) 947-3530 (fax) schofield.john@epa.gov

NOTE: This email, including any attachments, may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without expressed permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

To: susb@chevron.com[susb@chevron.com]

From: Lin, Sharon

Sent: Fri 4/14/2017 10:27:57 PM

Subject: RCRA Compliance Evaluation Inspection notification

Chevron Refinery El Segundo Docment Request.pdf

Hi, Susan,

Thanks for taking my call during your vacation. Attached please see the document request for the inspection next week. There will be seven inspectors (3 EPA + 4 DTSC) join the inspection. We will see you at 8:30 on Tuesday (April 18).

If you would like to get hold of me on Monday, please call my personal cell phone at Thanks.

Sharon

To: Lin, Sharon[Lin.Sharon@epa.gov]

From: Arora, Asha@DTSC
Sent: Fri 6/26/2015 6:53:54 PM

Subject: RE: Shell

HI Sharon,

How are you doing? Have you sent the 3007 information request to Shell? I do not know if Andy responded to you or not.

I know that you are going to be off 3 weeks in July. I will be off from July 14-30, 2015. I will be telecommuting on July 31st to make sure that I have reviewed everything for Shell.

If you have received anything else from the CUPA, please forward it to me, if it pertains to the treatment unit or generator areas. While conducting TP inspection, we need to see the process generating the waste.

Thanks Asha cell

Asha Arora

Senior Environmental Scientist (Specialist)

Department of Toxic Substances Control

Berkeley Office

(510) 540-3874

Asha.Arora@dtsc.ca.gov

From: Arora, Asha@DTSC

Sent: Thursday, June 04, 2015 7:54 AM

To: Lin, Sharon Subject: RE: Shell

Hi Sharon,

Thank you so much for your kind words. It is great that you will keep me in the loop for the 3007 information request also. I am looking forward to work with you.

Yes, our son and daughter make us proud. My daughter is going to the head of the English

| Department starting from August 2015 and her school has been chosen for one of the schools to get state award. She started few things new in the school that led to award and kid performances. |
|---|
| Thanks |
| Asha |
| |
| |
| Asha Arora |
| Senior Environmental Scientist (Specialist) |
| Department of Toxic Substances Control |
| Berkeley Office |
| (510) 540-3874 |
| Asha.Arora@dtsc.ca.gov |
| |
| From: Lin, Sharon [mailto:Lin.Sharon@epa.gov] Sent: Thursday, June 04, 2015 6:25 AM To: Arora, Asha@DTSC Subject: RE: Shell |
| Hi, Asha, |
| Congrats on your son's achievement! You must be so proud. |
| We have a couple of items in the works for Shell. (1) We have a 3007 information request almost ready to go. When I send it to Andy and Larry for review, I will cc you. You will get a |

sense of the data gap that we currently have. (2) field sampling and analysis plan. I plan to have a draft to share next week. this will have the details of what we plan to do the 1st week of August on the field sampling side.

I will be at two LA refineries next week with the South Coast Air District for its refinery inspection of two VOC air rules. I am not doing any RCRA stuff, just following the air inspectors. Our supervisor wanted us (RCRA staff) to learn how the south coast air district performs its refinery inspection since he came from the Clean Air Act enforcement program.

Sharon Lin, P.E.

U.S. Environmental Protection Agency Region 9

Enforcement Division

Air, Waste and Toxics Branch, ENF-2-2 75 Hawthorne Street

San Francisco, CA 94105

Tel: (415) 972-3446

Email: Lin.Sharon@epa.gov

From: Arora, Asha@DTSC [mailto:Asha.Arora@dtsc.ca.gov]

Sent: Wednesday, June 03, 2015 2:11 PM

To: Lin, Sharon Subject: Shell Importance: High

Hi Sharon,

How are you doing? I just came back from a vacation as I had gone for my son's graduation ceremony from the Harvard Business school.

everything by the 1st week of July. I am providing trainings/travel on June 10-12, 17-18 June 23-25 – CERS meetings with CalEPA July 14-30 – Vacation for a family out of the country Thank you Asha Asha Arora Senior Environmental Scientist (Specialist) Department of Toxic Substances Control Berkeley Office (510) 540-3874 Asha.Arora@dtsc.ca.gov

I am following up on some of the documents you were going to send me for Shell. I just got my nomax coverall. The reason I am asking early is because of my busy schedule. I wanted to read

To: Lin, Sharon[Lin.Sharon@epa.gov]

Cc: Schofield, John[Schofield.John@epa.gov]

From: Arora, Asha@DTSC **Sent:** Fri 7/31/2015 3:36:54 PM

Subject: RE: Shell Refinery

Thank you so much for your prompt response. I recall that you notified Andy and Melissa Hagen about this TP inspection. Once confirmed today, I will send an email to Steve and Melissa.

Yes, I like early start also.

Thanks Asha

From: Lin, Sharon [Lin.Sharon@epa.gov]

Sent: Friday, July 31, 2015 7:55 AM

To: Arora, Asha@DTSC Co: Schofield, John Subject: RE: Shell Refinery

I am waiting for confirmation from Shell regarding the exact meeting time for Monday. I hope to hear something from them by noon. I will give you a call as soon as I hear back from the facility. I will come by to pick you up on Monday. Hope we can start our day early.

Do you need to notify the CUPA for the TP inspection?

Sharon Lin, P.E.
U.S. Environmental Protection Agency Region 9
Enforcement Division
Air, Waste and Toxics Branch, ENF-2-2
75 Hawthorne Street
San Francisco, CA 94105
Tel: (415) 972-3446

Email: Lin.Sharon@epa.gov

----Original Message----

From: Arora, Asha@DTSC [mailto:Asha.Arora@dtsc.ca.gov]

Sent: Friday, July 31, 2015 7:53 AM

To: Lin, Sharon Cc: Schofield, John Subject: RE: Shell Refinery

Importance: High

Hi Sharon,

I am working (telecommuting) today and I just wanted to confirm two things:

- -Have you received a response from Shell? If yes, please share a copy wit me as a portions will help for the TP inspection also.
- -What time are you picking me up on Monday?

Thank you Asha cell From: Lin, Sharon [Lin.Sharon@epa.gov] Sent: Monday, July 20, 2015 2:36 PM To: Arora, Asha@DTSC; Schofield, John

Subject: RE: Shell Refinery

Hi, Asha,

Attached is the Shell Martinez refinery sampling plan (approved by our QA office). I am also attaching the ppt file for the figures since the pictures in the scanned SAP are of poor quality.

The current plan is for me to tag along with you to learn TP. John will be with the EPA field team for the field sampling. We could coordinate so you will be inspecting the TP unit next to the Pond 5D when the pond is being sampled.

Sharon Lin, P.E.

U.S. Environmental Protection Agency Region 9 Enforcement Division Air, Waste and Toxics Branch, ENF-2-2

75 Hawthorne Street San Francisco, CA 94105 Tel: (415) 972-3446

Email: Lin.Sharon@epa.gov

----Original Message----

From: Arora, Asha@DTSC [mailto:Asha.Arora@dtsc.ca.gov]

Sent: Monday, July 20, 2015 2:18 PM To: Lin, Sharon; Schofield, John Subject: FW: Shell Refinery

Importance: High

Hi Sharon/John,

I am forwarding inspection information received from the Contra Costa County CUPA. DTSC has a number of concerns but not limited to the following:

- Shell's memo and legal interpretation for ERM and their samplings.
- -Sampling and analytical results, including chain of custody.
- -Kleen Blast (Kleen Industrial Services as the owner is the same and he has multiple companies all over the state for the same stuff).
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- -The CUPA conducted HWG inspection in 2 hourss -The CUPA conducted tiered permitting (TP), APSA, and BP inventories inspections in 2 hours

Sharon - I will be working on July 31st and we can chat more. I will be periodically checking my emails...

John - I understand that you will be leading the sampling team. DTSC recommends EPA to take samples from the ETP treatment pond 5D.

Thank you Ash<u>a</u> cell

From: Melissa.Hagen@hsd.cccounty.us [Melissa.Hagen@hsd.cccounty.us]

Sent: Thursday, July 09, 2015 12:26 PM

To: Arora, Asha@DTSC

Cc: Alexandra.Mcmullen@hsd.cccounty.us

Subject: Fw: Shell Refinery

(See attached file: shell_Jan2015.pdf)

sorry for the delay

Melissa J. Hagen Hazardous Materials Specialist Contra Costa Health Services-HazMat 4585 Pacheco Blvd., Suite 100 Martinez, CA 94553 (925) 335-3200 Office

---- Forwarded by Melissa Hagen/HazMat/HSD/US on 07/09/2015 12:20 PM -----

From: Melissa Hagen/HazMat/HSD/US

To: "Arora, Asha@DTSC" <Asha.Arora@dtsc.ca.gov>,

Date: 07/09/2015 10:42 AM Subject: Re: Shell Refinery

did you get all you needed?

Melissa J. Hagen Hazardous Materials Specialist Contra Costa Health Services-HazMat 4585 Pacheco Blvd., Suite 100 Martinez, CA 94553 (925) 335-3200 Office

From: "Arora, Asha@DTSC" <Asha.Arora@dtsc.ca.gov>

To: "Melissa.Hagen@hsd.cccounty.us" <Melissa.Hagen@hsd.cccounty.us>,

Date: 07/06/2015 08:32 AM Subject: Shell Refinery

Hi Melissa,

I hope everything is going well with you. I have a favor to ask of you. Please email me you last tiered permitting inspection for the Shell refinery.

For the FA, it shows that they have surety bond. Please let me know the Contra Costa County listed as the beneficiary or not.

Thank you Asha

Asha Arora

Senior Environmental Scientist (Specialist) Department of Toxic Substances Control Berkeley Office

Asha.Arora@dtsc.ca.gov

To: Lin, Sharon[Lin.Sharon@epa.gov]

From: Wu, Brian@DTSC

Sent: Wed 11/30/2016 5:03:13 AM

Subject: Re: Plan for next week's Torrance Refinery Inspection

Hi Sharon,

I am out of office until Thursday, and I will get back to you by then. Thanks,

Brian Wu 818-717-6696

Sent from my iPhone

On Nov 29, 2016, at 1:27 PM, Lin, Sharon <Lin.Sharon@epa.gov> wrote:

Hi, Brian,

Kandice and I plan to fly down Monday morning. We plan to start our inspection at Torrance Refinery at 1pm on Monday. We fly back Thursday mid day. Here is the tentative schedule for the week.

Monday (Dec 5): 1pm start inspection – safety orientation, process flows, overview. Maybe field depending on the information. I would like to end at 4:30pm if possible. EPA and DTSC will decide the flow of the day 2 inspection based on the information gathered at the briefing.

Tuesday & Wed. Inspection.

I plan to notify the refinery this Friday and transmit the document request (see attached). Please send me your comments by Thursday COB if possible.

Safety gear: Nomex suit, steel-toed boots, safety glasses, ear protection, hard hat.

| My cell phone is in case you need to get hold of me on Monday. My office phone is (415) 972-3446 if you would like to call this week. |
|---|
| Please let me know if you would like to meet prior to inspection. Perhaps lunch at noon somewhere near the refinery? |
| We could do a quick check in by phone this Friday afternoon if you are available. Please advise. Thanks! |
| sharon |
| |
| |
| <torrance refinerydocumentrequest.docx=""></torrance> |

To: Lin, Sharon[Lin.Sharon@epa.gov]

From: Wu, Brian@DTSC

Sent: Thur 12/1/2016 7:12:56 PM

Subject: RE: Plan for next week's Torrance Refinery Inspection

Hi Sharon,

I like your Records/Documents Request. It shows me how you conducting a processes approaching inspection. I am looking forward for the inspection.

I have all the safety equipment you listed. If you need me to bring any safety/monitoring and/or sampling equipment, please let me know. My cell phone is and you can call me any time.

I can meet you at the facility at 1:00 PM or any other place if you want to meet earlier for lunch meeting. We can discuss the logistics tomorrow. Thanks,

Brian Wu



From: Lin, Sharon [mailto:Lin.Sharon@epa.gov]
Sent: Tuesday, November 29, 2016 1:27 PM
To: Wu, Brian@DTSC <Brian.Wu@dtsc.ca.gov>
Cc: Bellamy, Kandice <Bellamy.Kandice@epa.gov>

Subject: Plan for next week's Torrance Refinery Inspection

| Hi, Brian, |
|---|
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| Monday (Dec 5): 1pm start inspection – safety orientation, process flows, overview. Maybe field depending on the information. I would like to end at 4:30pm if possible. EPA and DTSC will decide the flow of the day 2 inspection based on the information gathered at the briefing. |
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| My cell phone is the phone is (415) 972-3446 if you would like to call this week. |
| Please let me know if you would like to meet prior to inspection. Perhaps lunch at noon somewhere near the refinery? |
| We could do a quick check in by phone this Friday afternoon if you are available. Please advise. Thanks! |
| sharon |
| |

To: Lin, Sharon[Lin.Sharon@epa.gov]; Schofield, John[Schofield.John@epa.gov]

From: Arora, Asha@DTSC **Sent:** Mon 7/20/2015 9:18:09 PM

Subject: FW: Shell Refinery

shell Jan2015.pdf

Hi Sharon/John,

I am forwarding inspection information received from the Contra Costa County CUPA. DTSC has a number of concerns but not limited to the following:

- Shell's memo and legal interpretation for ERM and their samplings.
- -Sampling and analytical results, including chain of custody.
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Sharon - I will be working on July 31st and we can chat more. I will be periodically checking my emails...

John - I understand that you will be leading the sampling team. DTSC recommends EPA to take samples from the ETP treatment pond 5D.

Thank you Asha cell

From: Melissa.Hagen@hsd.cccounty.us [Melissa.Hagen@hsd.cccounty.us]

Sent: Thursday, July 09, 2015 12:26 PM

To: Arora, Asha@DTSC

Cc: Alexandra.Mcmullen@hsd.cccounty.us

Subject: Fw: Shell Refinery

(See attached file: shell_Jan2015.pdf)

sorry for the delay

Melissa J. Hagen Hazardous Materials Specialist Contra Costa Health Services-HazMat 4585 Pacheco Blvd., Suite 100 Martinez, CA 94553 (925) 335-3200 Office

---- Forwarded by Melissa Hagen/HazMat/HSD/US on 07/09/2015 12:20 PM -----

From: Melissa Hagen/HazMat/HSD/US

To: "Arora, Asha@DTSC" <Asha.Arora@dtsc.ca.gov>,

Date: 07/09/2015 10:42 AM

Subject: Re: Shell Refinery

did you get all you needed?

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Hi Melissa,

I hope everything is going well with you. I have a favor to ask of you. Please email me you last tiered permitting inspection for the Shell refinery.

For the FA, it shows that they have surety bond. Please let me know the Contra Costa County listed as the beneficiary or not.

Thank you Asha

Asha Arora Senior Environmental Scientist (Specialist) Department of Toxic Substances Control Berkeley Office (510) 540-3874 Asha.Arora@dtsc.ca.gov To: Lin, Sharon[Lin.Sharon@epa.gov]

From: Wu, Brian@DTSC

Sent: Thur 11/17/2016 12:03:25 AM

Subject: RE: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining

Company, LLC, CAD08354052

Hi Sharon,

I will gather the information, and get back to you tomorrow! Thanks!

Brian Wu

From: Lin, Sharon [mailto:Lin.Sharon@epa.gov] Sent: Wednesday, November 16, 2016 3:43 PM

To: Soria, Maria@DTSC <Maria.Soria@dtsc.ca.gov>; Schofield, John

<Schofield.John@epa.gov>

Cc: Bellamy, Kandice <Bellamy.Kandice@epa.gov>; Lynch, Philip@DTSC <Philip.Lynch@dtsc.ca.gov>; Wu, Brian@DTSC <Brian.Wu@dtsc.ca.gov>; Kou,

Roberto@DTSC <Roberto.Kou@dtsc.ca.gov>; Agarwal, Mukul@DTSC

<Mukul.Agarwal@dtsc.ca.gov>

Subject: RE: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining Company, LLC, CAD08354052

Hi, Brian,

We look forward to working with you. The facility history description on the EnviroStor website suggests that various units at the facility are covered under the tiered permitting. I couldn't locate the tiered permitting documents in CERS. Hopefully you folks have it.

Also, if you have a point contact for the corrective action for this facility, that would be great too. Thanks!

Sharon

From: Soria, Maria@DTSC [mailto:Maria.Soria@dtsc.ca.gov]

Sent: Wednesday, November 16, 2016 2:49 PM To: Schofield, John < Schofield. John @epa.gov>

Cc: Lin, Sharon <Lin.Sharon@epa.gov>; Bellamy, Kandice <Bellamy.Kandice@epa.gov>;

Lynch, Philip@DTSC < Philip.Lynch@dtsc.ca.gov >; Wu, Brian@DTSC

< Brian. Wu@dtsc.ca.gov >; Kou, Roberto@DTSC < Roberto.Kou@dtsc.ca.gov >; Agarwal,

Mukul@DTSC < Mukul. Agarwal@dtsc.ca.gov>

Subject: RE: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance

Refining Company, LLC, CAD08354052

Hi John, Sharon and Kandice. The DTSC staff person assigned to accompany USEPA is Brian Wu from the DTSC Chatsworth office.

Brian, please follow up with Sharon as requested below. You can coordinate with Dan Lynch on files that may reside in the Clovis office if needed. Thank you.

From: Schofield, John [mailto:Schofield.John@epa.gov] Sent: Wednesday, November 16, 2016 2:31 PM

To: Soria, Maria@DTSC

Cc: Lin, Sharon; Bellamy, Kandice

Subject: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining

Company, LLC, CAD08354052

Maria,

This is a follow-up to this afternoon's call. EPA will be conducting a CEI of the reference facility December 5-8, 2016. As stated in our telephone conversation EPA is requesting DTSC to also participate in the inspection. The EPA Inspection Team will be Kandice Bellamy (415-972-3304) and Sharon Lin (415-972-3346). Sharon is the inspection lead.

The general plan is to arrive at the facility the afternoon of December 5th to start the document/information gathering process. The next two full days will be the site inspection which will include evaluation of the facility processes to determine if these processes generated listed and/or characteristic HW (and how the HWs are managed).

In preparing for the inspection, the EPA Inspection Team is developing a list of documents EPA would like to see if DTSC had on hand that could be shared with Region 9 prior to the inspection.

Once a DTSC staff person(s) has been assigned, please have the person(s) contact Sharon to begin sharing information and coordinating the inspection schedule.

EPA looks forward to working with DTSC on this inspection.

regards,

John

John Schofield
U. S. Environmental Protection Agency
Region 9
Enforcement Division

Air, Waste and Toxics Branch, ENF-2-2 75 Hawthorne Street San Francisco, CA 94105 (415) 972-3386 (415) 947-3530 (fax) schofield.john@epa.gov

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recipient, please contact the sender and delete all copies.

To: Lin, Sharon[Lin.Sharon@epa.gov]; Schofield, John[Schofield.John@epa.gov]

From: Arora, Asha@DTSC

Sent: Mon 7/20/2015 10:01:44 PM

Subject: RE: Shell Refinery

Hi Sharon,

Thanks for sharing. It appears that pond 5D is already in on your list.

Thanks Asha

From: Lin, Sharon [Lin.Sharon@epa.gov] Sent: Monday, July 20, 2015 2:36 PM To: Arora, Asha@DTSC; Schofield, John

Subject: RE: Shell Refinery

Hi, Asha,

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U.S. Environmental Protection Agency Region 9
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Air, Waste and Toxics Branch, ENF-2-2
75 Hawthorne Street
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Tel: (415) 972-3446

Email: Lin.Sharon@epa.gov

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To: "Arora, Asha@DTSC" < Asha. Arora@dtsc.ca.gov >,

Date: 07/09/2015 10:42 AM Subject: Re: Shell Refinery

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Thank you Asha

Asha Arora Senior Environmental Scientist (Specialist) Department of Toxic Substances Control Berkeley Office (510) 540-3874 Asha.Arora@dtsc.ca.gov To: Lin, Sharon[Lin.Sharon@epa.gov]

Cc: Soria, Maria@DTSC[Maria.Soria@dtsc.ca.gov]

From: Arora, Asha@DTSC **Sent:** Fri 11/18/2016 4:17:24 PM

Subject: RE: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining

Company, LLC, CAD08354052

Torrance Refinery TP 10118524 Documents.pdf

Hi Sharon,

Attached is Torrance Refinery tiered permitting notification long with facility information. The correct EPA ID# is $\underline{CAD008354052}$. I noticed a couple of interesting items in their 2 unit notifications. Please call me on my cellphone and I will update you.

Thank you Asha

Cell

From: Lin, Sharon [mailto:Lin.Sharon@epa.gov]
Sent: Thursday, November 17, 2016 8:05 AM

To: Arora, Asha@DTSC Cc: Soria, Maria@DTSC

Subject: RE: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining

Company, LLC, CAD08354052

Asha, thanks.

sharon

From: Arora, Asha@DTSC [mailto:Asha.Arora@dtsc.ca.gov]

Sent: Wednesday, November 16, 2016 7:10 PM

To: Lin, Sharon < Lin. Sharon@epa.gov>

Cc: Soria, Maria@DTSC < Maria.Soria@dtsc.ca.gov>

| Subject: Fwd: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining Company, LLC, CAD08354052 |
|--|
| Hi Lin, |
| I will provide tiered permitting information from CERS on Friday morning as I am in Long Beach and I do not have my lab top with me. I will be coming home tomorrow evening. |
| If you want to talk with me after getting TP information, please call me on my cellphone. I recall that you also telecommute on Fridays. |
| I am off next week. |
| Thank you! |
| Asha |
| Sent from my iPhone |
| Begin forwarded message: |

From: "Soria, Maria@DTSC" < Maria.Soria@dtsc.ca.gov >

Date: November 16, 2016 at 4:36:19 PM PST

To: "Arora, Asha@DTSC" < Asha.Arora@dtsc.ca.gov >

Subject: FW: Notification RCRA Compliance Evaluation Inspection - PBF Energy, Torrance Refining Company, LLC, CAD08354052

In your spare time, can you see if CERS has the tiered permitting information that Sharon needs? Thanks.

From: Lin, Sharon [mailto:Lin.Sharon@epa.gov] Sent: Wednesday, November 16, 2016 3:43 PM To: Soria, Maria@DTSC; Schofield, John

Cc: Bellamy, Kandice; Lynch, Philip@DTSC; Wu, Brian@DTSC; Kou, Roberto@DTSC; Agarwal,

Mukul@DTSC

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Lynch, Philip@DTSC < Philip.Lynch@dtsc.ca.gov >; Wu, Brian@DTSC

<<u>Brian.Wu@dtsc.ca.gov</u>>; Kou, Roberto@DTSC <<u>Roberto.Kou@dtsc.ca.gov</u>>; Agarwal,

Mukul@DTSC < Mukul. A garwal@dtsc.ca.gov>

Subject: RE: Notification RCRA Compliance Evaluation Inspection - PBF Energy,

Torrance Refining Company, LLC, CAD08354052

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|---|
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| EPA looks forward to working with DTSC on this inspection. |
| regards, |
| John |
| |

John Schofield U. S. Environmental Protection Agency Region 9 Enforcement Division

Air, Waste and Toxics Branch, ENF-2-2 75 Hawthorne Street San Francisco, CA 94105 (415) 972-3386 (415) 947-3530 (fax) schofield.john@epa.gov

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To: Lin, Sharon[Lin.Sharon@epa.gov]

From: Arora, Asha@DTSC
Sent: Fri 3/3/2017 4:12:21 PM
Subject: Fw: CESW Shell refinery

Hi Sharon,

I was wondering about the status of your enforcement case. I thought you mentioned about recovery....

See email below:

HSC, section 25143.2 (d) Except as otherwise provided in subdivisions (e), (f), (g), and (h), recyclable material that meets the definition of a non-RCRA hazardous waste in Section 25117.9, is managed in accordance with Section 25143.9, and meets or will meet any of the following requirements is excluded from classification as a waste:

- (1) The material can be shown to be recycled and used at the site where the material was generated.
- (2) The material qualifies as one or more of the following:
- (A) The material is a product that has been processed from a hazardous waste, or has been handled, at a facility authorized by the department pursuant to the facility permit requirements of Article 9 (commencing with Section 25200) to process or handle the material, if the product meets both of the following conditions:
- (i) The product does not contain constituents, other than those for which the material is being recycled, that render the material hazardous under regulations adopted pursuant to Sections 25140 and 25141.
- (ii) The product is used, or distributed or sold for use, in a manner for which the product is commonly used.
- (B) The material is a petroleum refinery waste containing oil that is converted into petroleum coke at the same facility at which the waste was generated, unless the resulting coke product would be identified as a hazardous waste under this chapter.

| If you get a chance, please call me on my cellphone, | . I have been sick |
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| for a week but working from home. | |

Thank you!!! Asha From: Karine.Abramians@hsd.cccounty.us < Karine.Abramians@hsd.cccounty.us>

Sent: Thursday, March 2, 2017 11:27 AM

To: Arora, Asha@DTSC Subject: CESW Shell refinery

Hi Asha,

I had a quick question regarding the drum rinsing at Shell Refinery. They currently have a permit under CESW.

They rinse the drums on a lined concrete slab. The rinsate flows though a metal grate into a shallow sump that is connected to a pipe which flows to a baker tank. The contents of the baker tank (they claim to be ERM) are then sent to the coker to recover petroleum as coke. They claim the baker tank will never be a hazardous waste storage tank as the rinsate is an ERM going to the coker for petroleum recovery.

My questions are:

- 1. Can the rinsate from the drum rinsing go into an underground sump? The sump is concrete. Are they excluded because of 25143.2 (d)(2)(B)?
- 2. How can I ensure that this exemption would apply to all the rinsate as they may rinse containers that do not contain a petroleum product?

Thanks Asha. Sorry for bothering you.

Karine Abramians
Hazardous Materials Specialist
Contra Costa Health Services HazMat
925-335-3221

To: Lin, Sharon[Lin.Sharon@epa.gov]
Cc: Doyle, John M[JFPI@chevron.com]

From: Worley, Susan (SUSB) **Sent:** Fri 4/14/2017 10:45:14 PM

Subject: Re: RCRA Compliance Evaluation Inspection notification

Thanks Sharon. John Doyle and I will be your primary contacts. If he has any questions he will contact you on Monday. See you all Tuesday morning.

Sent from my iPhone

On Apr 14, 2017, at 3:28 PM, Lin, Sharon < Lin. Sharon@epa.gov > wrote:

Hi, Susan,

Thanks for taking my call during your vacation. Attached please see the document request for the inspection next week. There will be seven inspectors (3 EPA + 4 DTSC) join the inspection. We will see you at 8:30 on Tuesday (April 18).

If you would like to get hold of me on Monday, please call my personal cell phone at (Thanks.

Sharon

<Chevron Refinery El Segundo Docment Request.pdf>

To: Wu, Brian@DTSC[Brian.Wu@dtsc.ca.gov]
Cc: Bellamy, Kandice[Bellamy.Kandice@epa.gov]

From: Lin, Sharon

Sent: Tue 11/29/2016 9:26:58 PM

Subject: Plan for next week's Torrance Refinery Inspection

Torrance RefineryDocumentRequest.docx

Hi, Brian,

Kandice and I plan to fly down Monday morning. We plan to start our inspection at Torrance Refinery at 1pm on Monday. We fly back Thursday mid day. Here is the tentative schedule for the week.

Monday (Dec 5): 1pm start inspection – safety orientation, process flows, overview. Maybe field depending on the information. I would like to end at 4:30pm if possible. EPA and DTSC will decide the flow of the day 2 inspection based on the information gathered at the briefing.

Tuesday & Wed. Inspection.

I plan to notify the refinery this Friday and transmit the document request (see attached). Please send me your comments by Thursday COB if possible.

Safety gear: Nomex suit, steel-toed boots, safety glasses, ear protection, hard hat.

My cell phone is in case you need to get hold of me on Monday. My office phone is (415) 972-3446 if you would like to call this week.

Please let me know if you would like to meet prior to inspection. Perhaps lunch at noon somewhere near the refinery?

| We could do a quick check in by phone this Friday afternoon if you are available. Please advise. Thanks! | |
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